

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Accessibility of User Interfaces, and Video)	MB Docket No. 12-108
Programming Guides and Menus)	

**Declaration of Stephen A. Fox,
Senior Vice President, Chief Technology Officer of Cable One, Inc.**

Declarant hereby states as follows:

1. My name is Stephen A. Fox. I am employed as Senior Vice President, Chief Technology Officer by Cable One, Inc. ("Cable One"). My business address is 210 E. Earll Drive, Phoenix, Arizona 85012.
2. Cable One owns and operates 41 cable television systems that provide video, Internet and voice service to subscribers in 19 midwestern, western and southern states. At the end of 2012, Cable One provided cable service to approximately 600,000 video subscribers. Eight of Cable One's cable systems serve more than 20,000 video subscribers.
3. I have been with Cable One since 1988. Areas of responsibility in my present position include information technology, engineering, digital video service (Cable ONE Digital), high-speed Internet service (cableone.net) and telephone service (Cable ONE Phone).
4. I understand that the Federal Communications Commission is currently considering adoption of rules to implement Sections 204 and 205 of the Twenty First Century Communications and Video Accessibility Act of 2010 ("CVAA"). Pursuant to Section 205, multichannel video programming distributors ("MVPDs") are required, if achievable and upon request, to make audibly accessible on-screen text menus and guides provided by navigation devices available to blind or visually impaired customers.

5. Such "talking guides" when incorporated into a navigation device will likely require the combination of both hardware and software; neither solution standing alone will provide the required functionality to the end user.

6. Based on Cable One's experience with cable equipment vendors, we understand that the development of innovative hardware and software solutions for the MVPD industry as a whole is largely driven by the efforts of, and at the direction of, the largest cable multiple system operators ("MSOs"), typically those with at least 2 million subscribers. These companies alone have the scale to tell equipment manufacturers and software developers what products to develop. Cable One benefits by such development efforts; but only *after* the largest MSOs have been served are we able to purchase the equipment and software "off-the-shelf."

7. Cable One's video subscriber base represents only about 1% of the approximately 56 million cable subscribers reported by SNL Kagan as of 2012, and thus Cable One accounts for an extremely small portion of the video customer premises equipment ("CPE") being manufactured today. This level of buying power is simply insufficient to enable us to secure any kind of custom solution from equipment manufacturers at a reasonable price. Moreover, only the largest MSOs have the scale to help defray development costs for complicated accessibility solutions such as talking guides.

8. Today, Cable One primarily relies on an Arris-Motorola platform for its set-top boxes that run a user interface provided by Rovi. To date, Cable One has not had any material influence on these providers' application development road map and timetables for product releases and would be relying on these companies to develop compliant solutions. At this point, we have no way of knowing whether Arris-Motorola or Rovi, after serving the needs of the largest operators, will be able to convert their custom built solutions into "off the shelf" products that Cable One can purchase and deploy within three years.

9. Making our ability to come into compliance even less predictable, is the fact that the largest MSOs are partially or entirely developing many of their software solutions in-house, thus our vendors would not have the access necessary in order to be able to resell that software solution to us. In this case, the largest MSO may also be working on its own hardware solution. This too will leave smaller MVPDs with fewer options, and makes knowing whether there will be an off the shelf solution for Cable One within three years extremely uncertain.

10. Because of Cable One's significant deployment of set-top boxes relying on the Arris-Motorola platform and Rovi user interface, it would be commercially impracticable for Cable One to comply with a "talking guide" requirement absent the availability of the necessary hardware and or software elements from these suppliers. Although Cable One has no first-hand knowledge of any plans by Arris-Motorola and Rovi to develop and deploy such products, we assume they will endeavor to do so at the behest of their largest customers, such as Comcast or Time Warner Cable.

11. Based on our extensive experience in dealing with cable equipment suppliers, involving such developments as addressable boxes, digital boxes, HD boxes, etc., we anticipate that even if the principal set-top manufacturers are able to supply compliant "talking guide" boxes to their major customers within the three-year deadline, such devices may not be available in the necessary quantities to smaller operators like Cable One for considerable periods thereafter.

12. Moreover, Cable One's inability to significantly influence the set-top box supply chain has nothing to do with the number of individual Cable One systems that happen to have more than 20,000 subscribers. Rather, equipment suppliers look to the overall size of their customer, not the size of individual systems that customer may operate. In reality, such buying power rests almost exclusively with the largest operators, *e.g.*, with at least 2 million subscribers.

13. I do not believe that Cable One would be able to comply with any "talking guide" mandate within three years, but believe that the company could within five years.

Executed on September 25, 2013

A handwritten signature in dark ink, appearing to read "S. A. Fox", is written over a solid horizontal line.

Stephen A. Fox